REMARKS

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1, 4-7 and 10-15 are present in the application. Claims 1 and 7 are independent. By this Amendment, claims 1, 4, 7, 10, 14 and 15 are amended. No new matter is involved.

Reconsideration of this application, as amended, is respectfully requested.

Claim Rejections Under 35 U.S.C. § 102

Claims 1, 4-7 and 10-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,820,075 to Shanahan et al. ("Shanahan"). This rejection is respectfully traversed.

Independent claim 1 recites a text generation method for generating a natural sentence from parts of the sentence, comprising: an input step using input means for inputting only parts of the sentence wherein the natural sentence is characteristic of a style or an expression, an extracting step using extracting means for extracting at least one candidate sentence part or phrase, which includes an inputted part of the sentence, from a database, and a text generation step using text generation means for generating a natural sentence using the inputted parts of the sentence and the extracted at least one candidate sentence part or phrase, wherein parser means morphologically analyzes and parses the extracted at least one sentence part or phrase to obtain a syntactic structure of the at least one candidate sentence part or phrase by determining the syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by applying a statistical technique using a syntactic model, thereby generating a sentence having a

maximum probability of being a natural sentence which is characteristic of the style or expression.

Independent claim 7 recites a text generation apparatus for generating a natural sentence, comprising: input means for inputting only parts of the sentence wherein the natural sentence is characteristic of a style or expression, extracting means for extracting at least one candidate sentence part or a phrase, which includes an inputted part of the sentence, from a database, and text generation means for generating an optimum natural sentence by using the extracted text, wherein parser means morphologically analyzes and parses the extracted at least one candidate sentence part or phrase to obtain a syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by determining the syntactic probability of the at least one candidate sentence part or phrase by applying a statistical technique using a syntactic model, thereby generating a sentence having a maximum probability of bring a natural sentence which is characteristic of the style or expression.

Applicants respectfully submit that the above combinations of steps and elements as set forth in independent claims 1 and 7 are not disclosed nor suggested by Shanahan.

Shanahan is directed to forming queries by identifying a document entity fragment, analyzing document content surrounding the document entity fragment to identify a first document attribute, defining a query using the document entity fragment and the first document attribute, accessing an entity database to identify a set of entities that satisfy an auto-completion request, where the database includes entities and entity context information that identifies a second document attribute, wherein the accessing act compares the first and second document

attributes to determine a degree of match between the entity fragment and the entities in the database. See col. 3, lines 1-18 of Shanahan.

Shanahan focuses on a document auto-completion scheme in which document auto-completion saves a user from having to retype text (and other document content such as graphics) and related markup such as hyperlinks, bibliographic entries etc., by providing suggestions of words that have been used previously in a contextually similar manner. (Section G.2., first paragraph of Shanahan). As further explained in section G.2., Shanahan's auto-completion features are directed to simply completing words (e.g., by just typing a few letters), phrases and sentences without a user having to manually type in all of the letters or words. Shanahan has no concept of parser means morphologically analyzes and parses the extracted at least one candidate sentence part or phrase to obtain a syntactic probability of the appropriateness of the order of candidate sentence parts or phrases by determining the syntactic probability of the at least one candidate sentence part or phrase by applying a statistical technique using a syntactic model, thereby generating a sentence having a maximum probability of bring a natural sentence which is characteristic of the style or expression .

Instead, Shanahan uses statistics to generate metadata about a document, and any syntactic analysis is limited to creating and/or modifying personalities using predefined questions that can be used in conjunction with a lexicon or lexicons associated with a personality to create one or more question forms (see section D.5. of Shanahan) or combining pairs of entities to annotate them (see section E.4. of Shanahan).

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Shanahan also differs from the claimed invention in that Shanahan is <u>not</u> concerned with generating a natural sentence which is characteristic of a spoken or written style or an expression.

Accordingly, claims 1 and 7 are not disclosed by Shanahan, and reconsideration and withdrawal of this rejection of claims 1, 4-7 and 10-15 under 35 U.S.C. § 102 are respectfully requested.

CONCLUSION

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Robert J. Webster, Registration No. 46,472 at (703) 205-8000 in the Washington, D.C. area.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicants respectfully petition for a two (2) month extension of time for filing a response in connection with the present application.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Dated: SEP 2 5 2009   Respectfully submitted,

By _____
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